REMARKS/ARGUMENTS

In view of the foregoing amendments and the following remarks, the applicant respectfully submits that the pending claims are not rendered obvious under 35 U.S.C. § 103. Accordingly, it is believed that this application is in condition for allowance. **If, however, the Examiner believes that there are any unresolved issues, or believes that some or all of the claims are not in condition for allowance, <u>the applicant respectfully requests that the Examiner contact the undersigned to schedule a telephone Examiner Interview before any further actions on the merits</u>.**

The applicant will now address each of the issues raised in the outstanding Office Action. Before doing so, however, the undersigned would like to thank Examiner Amini for courtesies extended during a telephone interview on September 21, 2006 (referred to as "the telephone interview"). The substance of the telephone interview is discussed below.

Rejections under 35 U.S.C. § 103

Claims 15, 17, 19-21, 23, 26-28 and 32-39 stand rejected under 35 U.S.C. § 103 as being unpatentable over US Patent No. 5,956,000 ("the Kreitman patent") in view of WIPO published application PCT WO 98/26578 ("the Mayer application"). The applicant respectfully requests that the Examiner reconsider and withdraw this ground of rejection in view of the following.

Before addressing various patentable features of the claims, the cited art is introduced.

As discussed during the telephone interview, the Kreitman patent modulates the intensities of overlapping portions of image portions of an entire image by controlling the intensities of the basic projection units to ensure that the amount of light received by the large format projection screen is uniform. (See, e.g., column 4, lines 26-30.) For example, the Kreitman patent might gradually reduce intensity to 0% in an overlapping image area, while maintaining intensity at 100% in non-overlapping image areas. The Kreitman patent also compensates for misalignments by using a translation and scaling transformation and a rotation transformation. (See, e.g., column 7, lines 1-5.) These transformations are based on manual user input, via a joystick, to align images. (See, e.g., column 6, lines 11-43.) Color change due to overlap of two color patterns (e.g., lines) might be used to help a viewer to align patterns during an alignment process. (See, e.g., column 6, lines 25-37.)

As discussed during the telephone interview, the Mayer application adjusts brightness, gamma and contrast of image elements using smoothing factors. (See, e.g., the Abstract.) Further, behavior profiles for each of a plurality of projectors by measuring projector display of special patterns of various colors. (See, e.g., nested loop of Figure 2A, and element 326.) Referring to block 328 of Figure 2A and page 10, lines 13-30, these behavior profiles may be used by a technician to make adjustments,

using native controls, to the projectors. Furthermore, hot spots due to brightness mismatches may be eliminated using an inverse map of brightness contour map. (See blocks 330-336 of Figure 2B and page 10, line 22 through page 11, line 15.)

Having introduced the Kreitman patent and the Mayer application, patentable features of each of independent claims 15, 17 and 23 are addressed.

Independent claim 15 is not rendered obvious by the Kreitman patent and the Mayer application because these references, either taken alone or in combination, neither teach, nor suggest, image data conversion means for converting input (color) image data into partial (color) image data *on the basis of gray scale correction data* (See, e.g., 15A and 15B of Figure 2.) *and color conversion matrix data* (See, e.g., 11A and 11B of Figure 2) *of each of said plurality of partial image display means*. As discussed during the telephone interview, page 24, line 6 et. seq. of the present application provides an example of gray scale correction data, and a chromaticity conversion matrix is discussed on page 14, line 1 et. seq. of the present application. The acquisition of the gray scale correction data and the chromaticity conversion matrix may require a system such as that illustrated in Figure 3 of the present application.

This combination of features is neither taught, nor suggested, by the cited references. According, independent claim 15 is not rendered obvious by these references for at least this reason. Since claims 26 and

32-35 depend from claim 15, they are similarly not rendered obvious.

Independent claim 17 is not rendered obvious by the Kreitman patent and the Mayer application because these references, either taken alone or in combination, neither teach, nor suggest, image data conversion means for converting input color image data into said partial image data so as to display the partial images to be synthetically displayed as one image superimposed on a predetermined set bias on the basis of bias correction data provided according to a position in the one image. Examples of this feature are illustrated in Figures 6A-6C of the present application.

This feature is neither taught, nor suggested, by the cited references. According, independent claim 17 is not rendered obvious by these references for at least this reason. Since claims 19-21, 27 and 36 depend from claim 17, they are similarly not rendered obvious.

Finally, Independent claim 23 is not rendered obvious by the Kreitman patent and the Mayer application because these references, either taken alone or in combination, neither teach, nor suggest, image data conversion means for converting input (color) image data into said partial (color) image data, to be provided to a corresponding one of the plurality of partial image display means, so as *to correct color nonuniformities (See, e.g., 17A and 17B of Figure 9.) according to a position in the (color) images* synthetically displayed by said partial image display means *on the basis of nonuniformity correction coefficient data that changes in*

units of pixel positions and Red, Green and Blue primary colors. As discussed during the telephone interview, this feature is supported, for example, on page 27, line 16 et. seq. of the present application.

This feature is neither taught, nor suggested, by the cited references. According, independent claim 23 is not rendered obvious by these references for at least this reason.

Since claims 28 and 37-39 depend from claim 23, they are similarly not rendered obvious.

Entry of Amendments

Most of the amendments to the claims basically clarify the fact that, in the phrase "partial color image", the term "partial" is intended to modify the "color image", not "color". During the telephone interview, the Examiner indicated that he found the original phrase confusing. That is, the amendments to the claims clarify that the term "partial" modifies "image", and that the "image" is a color image. Since these amendments simply clarify an aspect of the present invention that would have been clear to one skilled in the art, these amendments should be entered.

The remaining amendments were made to more clearly show a useful, concrete and tangible result, as suggested by the Examiner.
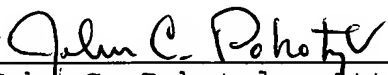
Since these amendments raise no new issues, and place the application into condition for allowance, they should be entered.

Conclusion

In view of the foregoing amendments and remarks, the applicant respectfully submits that the pending claims are in condition for allowance. Accordingly, the applicants request that the Examiner pass this application to issue.
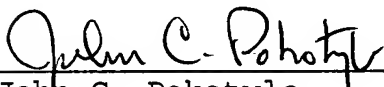
Respectfully submitted,

October 4, 2006

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CERTIFICATE OF MAILING under 37 C.F.R. 1.8(a)

I hereby certify that this correspondence is being deposited on **October 4, 2006** with the United States Postal Service as first class mail, with sufficient postage, in an envelope addressed to Mail Stop AF, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450

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